

AG:WMN/VR
F.#2010R000215

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.
★ FEB 19 2010 ★

BROOKLYN OFFICE

- - - - - X

UNITED STATES OF AMERICA

- against -

HENRI AL HALABI,
also known as "Isaac,"

Defendant.

- - - - - X

THE GRAND JURY CHARGES:

I N D I C T M E N T

CR 10 - 120

C. N. (T. 18, U.S.C., §§ 982,
1956(h), 1957(b),
1957(d)(1), 2320(a),
2323, 2 and 3551 et
seq.)

IRIZARRY, J.

CARTER, M.J.

COUNT ONE

(Money Laundering Conspiracy)

1. On or about and between May 1, 2009 and January 26, 2010, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant HENRI AL HALABI, also known as "Isaac," together with others, did knowingly and intentionally conspire to: (i) conduct financial transactions in and affecting interstate and foreign commerce, to wit: the transfer of United States currency contained in a bank account held under the name Zoom Denim, which transactions in fact involved the proceeds of specified unlawful activity, to wit: trafficking in counterfeit goods, in violation of Title 18, United States Code, Section 2320(a), knowing that the property involved in the transactions represented the proceeds of some form of unlawful activity, with the intent to promote the carrying on of the specified unlawful activity, in violation of

Title 18, United States Code, Section 1956(a)(1)(A)(i); and (ii) engage in monetary transactions, in and affecting interstate and foreign commerce, in criminally derived property that was of a value greater than \$10,000 and that was derived from specified unlawful activity, to wit: trafficking in counterfeit goods, in violation of Title 18, United States Code, Section 2320(a), all in violation of Title 18, United States Code, Section 1957.

(Title 18, United States Code, Sections 1956(h), 1957(b), 1957(d)(1) and 3551 et seq.)

COUNT TWO
(Trafficking in Counterfeit Clothing)

2. On or about and between May 1, 2009 and January 26, 2010, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant HENRI AL HALABI, also known as "Isaac," together with others, did knowingly and intentionally traffic and attempt to traffic in goods, to wit: clothing, knowingly using one or more counterfeit marks on and in connection with such goods.

(Title 18, United States Code, Sections 2320(a), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION AS TO COUNT ONE
(Money Laundering Conspiracy)

3. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged in Count One, the government will seek forfeiture in accordance with

Title 18, United States Code, Section 982, of all property involved in such offense, and all property traceable to such property, including but not limited to, any and all funds seized on or about January 26, 2010, previously held on deposit in JP Morgan Chase account number 743215790 in the name of Zoom Denim, Inc.

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value;
or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982, to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 982)

CRIMINAL FORFEITURE ALLEGATION AS TO COUNT TWO
(Counterfeit Clothing Trafficking)

5. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged in Count Two, the government will seek forfeiture in accordance with Title 18, United States Code, Section 2323, of: (a) any article, the making or trafficking of which is prohibited by Title 18, United States Code, Section 2320; (b) any property used or intended to be used, in any manner or part to commit or facilitate the commission of his violation of Title 18, United States Code, Section 2320; and (c) any property constituting or derived from any proceeds obtained directly or indirectly as a result of his violation of Title 18, United States Code, Section 2320, including but not limited to, any and all funds seized on or about January 26, 2010, previously held on deposit in JP Morgan Chase account number 743215790 in the name of Zoom Denim, Inc.

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value;
or

(e) has been commingled with other property which cannot be divided without difficulty;
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2323(b)(2)(A), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 2323)

A TRUE BILL



BENTON J. CAMPBELL
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK



FOREPERSON

No.

UNITED STATES DISTRICT COURT

EASTERN District of NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

HENRI AL HALABI,

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 982, 1956(h), 1957(b),
1957(d)(1), 2320(a), 2323, 2 and 3551 et seq.)

A true bill.

Sreethe Reddy

Foreman

Filed in open court this _____ day.

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Sreethe Reddy, Assistant U.S. Attorney, (718) 254-6276